

United States District Court
District of Maryland
(Northern Division)

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND
2016 AUG -8 AM 11:03
CLERK
BY KL

August 8, 2016

To: Judge Bennett
U.S. Courthouse-Chambers 5D

From: Mr. Miguel D. Tidwell-Plaintiff/Pro Se
(410) 300-9846

Re: Tidwell v IMPAQ International LLC

Civil Action No. RDB-16-0421

Dispositive Pretrial Motion

Dear Judge Bennett:

I Miguel D. Tidwell am requesting a Motion
for Summary
Judgement based on the following:

1. Exhibit 1 which identifies me as a person with limitations,
which the

Defendant IMPAQ admits to in response to my
Complaint. Even if the

Sign was on the back of my Chair at my workstation for 5
minutes that

is too long because it makes a spectacle out of me. Just
as if I get on a

Public Bus and I show the Bus Driver my Disability ID,
and he shouts out

"Your Disabled" because my disability is non visual, and

then the Bus

Driver or the Company that the Bus Driver works for says
well the people

in the back of the Bus didn't hear him say that, well that
doesn't matter

there were people on the Bus that did. That Bus Driver
has identified me

as a Disabled Individual Publicly, and that is against the
Law what I was

subjected to is no different, and that Sign was on the
back of my Chair at

my workstation for over 7 months.

2. Exhibit 2 which is a Sign on the back of a co-workers
Chair at her work

station which simply implies this Chair is reserved for and
gives her name.

that is a huge distinction.

3. Exhibits 3 through 5

4. Exhibits A through K

5. The above mentioned Exhibits supports and
compellingly substantiates

my Complaint and IMPAQ International needs to be
sanctioned. IMPAQ

International shows no remorse for what they did to me.

6. I am seeking the following relief to make me whole or
whatever the Court
offers.

A. Compensatory Damages: \$75,000 to make me whole
due to Discrimina

tion and identifying me as a Disabled person , and
subjecting me to

Mental Anguish, and Abuse which is considered grief and humiliation.

B. Back Pay: \$38,000 for money I would have been able to earn had I not been forced to resign.

C. Punitive Damages: \$50,000 for attempting to cover up the circumstances that led to the Complaint and violating the ADA Act of 1990 and the Americans with Disabilities Act Amendments Act ("ADAAA") of 2008.

Your kindest consideration in the decision you make will be greatly appreciated.

Sincerely,

Mr. Miguel D. Tidwell



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Columbia, Md. 21044

Ph# (410) 300-9846

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

Miguel D. Tidwell
Plaintiff-ProSe

vs.

Impaq International LLC
Defendant

Case No. RDB-16-0421

CERTIFICATE OF SERVICE

I hereby certify that on August 8th, 2016, a copy of Dispositive
Pre trial Motion - Summary Judgment

which was electronically filed in this case on August 8th, 2016, was
mailed via first class mail, postage prepaid, to Mr. Charles Bacharach /
Impaq International LLC - 233 East Redwood Street Balt., Md. 21202

Mr. Miguel D. Tidwell-ProSe

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